

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

July 18, 2003

Dear ENERGY STAR® Residential Light Fixture Partners and Other Interested Parties:

EPA welcomes your input on the following Draft 1 ENERGY STAR Residential Light Fixture (RLF) Version 3.2 specification. This document outlines the proposed new product criteria and testing and reporting procedures that manufacturers must abide by to label their products as ENERGY STAR. It is intended that once final, this specification will replace the current RLF Version 3.1 specification.

EPA proposes the following amendments in the attached Draft 1 Version 3.2 specification:

- Including recessed downlight retrofit kits as a fixture type eligible to earn the ENERGY STAR.

Over the last year, EPA has participated in discussions with stakeholders and conducted Internet, trade publication and other market and industry research to determine whether or not to include recessed downlight retrofit kits in the RLF specification. Based on this research, industry interest, and the potential energy savings that this product type offers, EPA is proposing to include recessed downlight retrofit kits as a new light fixture category in this Draft 1 specification.

- Specifying durability requirements for ANSI Lamp and Ballast Standardization and Maximum Ballast Operating Case Temperature for Optimal Performance. Please note that the requirements under the ANSI Ballast Standardization and Maximum Ballast Operating Case Temperature are already required under Version 3.1 and therefore, only appear in the Version 3.2 durability section as placeholders.

Over the last year, the Lighting Research Center (LRC), in cooperation with ENERGY STAR residential light fixture partners and other industry stakeholders, has conducted extensive research into the issue of durability. EPA's decision to require durability testing and documentation is a result of compelling evidence that shows heat as a likely cause of premature failure in fluorescent fixtures which is further supported by LRC's preliminary research. Therefore, new durability requirements are proposed in Table 3 of this Draft 1 specification.

In addition to minor clarifications, listed below are a few of the additional changes that have been proposed:

- Section 1 has been modified to include definitions for recessed downlight retrofit kit, optics, trim, and pigtail to support the recessed downlight retrofit amendment.
- Recessed downlight retrofit kits are now included in Section 2, Qualifying Products.

- The durability place holder, included in Table 1 of the existing Version 3.1 specification, has been replaced with new durability requirements including: ANSI-IEC Lamp Standardization; ANSI Ballast Standardization; and Maximum Ballast Operating Case Temperature for Optimal Performance. Please note that the latter two requirements are defined in Table 1 of the current Version 3.1 specification.
- Inclusion of additional product packaging requirements and appropriate installation instructions for recessed downlight retrofit kits.
- Inclusion of required documentation information to Table 3 as described in the Outdoor Fixtures Tables 2A and 2B.

Text boxes have been included in this Draft 1 specification to indicate what changes have been made to the Version 3.1 specification and provide EPA's justification for making these changes.

All industry stakeholders are encouraged to provide feedback on this Draft 1 Version 3.2 specification. EPA will carefully review and consider all comments submitted and distribute subsequent drafts, as necessary. It is EPA's intention to finalize this Version 3.2 specification as soon as discussions with stakeholders are complete. Once the specification is finalized, existing residential light fixture partners will not be required to resign a Partnership Agreement to continue their participation. **However, once an effective date has been determined, only those models that meet the requirements of the new Version 3.2 specification can continue to qualify.** Manufacturers of qualified products will have **3 months from the effective date to submit required documentation.** Products for which documentation is not received within 30 days of this 3-month deadline, and those products that no longer qualify under the new specification, will be removed from the Qualified Products List on the ENERGY STAR Web site after the partner is notified in writing by EPA.

The exchange of ideas and information among EPA, industry, and other interested parties is critical to the success of ENERGY STAR. As such, you are strongly encouraged to provide prompt feedback. All comments will be posted to the ENERGY STAR Web site unless the submitter requests that their comments remain confidential. If you support this Draft 1 Version 3.2 specification, or you do not wish to comment, please state this in writing or via e-mail. It is equally important that EPA understand which portions of the draft specification meet with stakeholder approval, in addition to identifying the sections that may need further revision.

To track EPA's progress in revising the ENERGY STAR Residential Light Fixture specification and to review comments, visit the Products in Development Web site at www.energystar.gov/productdevelopment and click on "Revisions to Existing Specifications".

We encourage you to review the Draft 1 Version 3.2 specification and provide comments by August 15, 2003. Comments should be sent to Meghan Hoyer, ICF Consulting, at mhoyer@icfconsulting.com. If you have any questions or concerns about this process, please feel free to contact me at (202) 564-6246 or shiller.david@epa.gov.

Sincerely,



David Shiller
EPA Program Manager
ENERGY STAR for Residential Light Fixtures